## Federal Defenders OF NEW YORK, INC.

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April 18, 2025

## **VIA ECF**

Honorable Judge Ronnie Abrams United States District Judge Southern District of New York **United States Courthouse** 40 Foley Square New York, NY 10007

**United States v. Foster Cooley** Re:

22 Cr. 651 (RA)

Application granted.

SO ORDERED.

Ronnie Abrams, U.S.D.J.

April 18, 2025

Dear Judge Abrams:

I write on behalf of my client Foster Cooley to respectfully request that the Court modify the conditions of the bond to allow Mr. Cooley to travel to New York from June 10, 2025 to June 12, 2025 – with the specific details of travel to be determined at the discretion of Pretrial Services – for the YAOP anniversary celebration. Neither Pretrial Services nor the government object to the request.

Mr. Cooley has remained on pretrial supervision since his arrest in 2022. Since then, Mr. Cooley has remained compliant with the terms of his supervised release and has successfully graduated from YAOP. Given Mr. Cooley's history of compliance while under pretrial supervision, the defense requests Mr. Cooley be afforded permission to travel to New York.

Thank you for your consideration of this request.

Respectfully submitted,

Assistant Federal Defender

Tel.: (212) 417-8730

cc: Andrew Chan, Esq., Assistant United States Attorney Dominique Jackson, Pretrial Services Officer